

Re: [EXTERNAL] Re: In re: NYC Policing During Summer 2020 - Conforti Privilege Log

Stoughton, Corey <CStoughton@legal-aid.org>

Fri 7/15/2022 4:56 PM

To: Riordan, Shannon (LAW) <sriordan@law.nyc.gov>; Weng, Jenny (Law) <jweng@law.nyc.gov>; Hamill, Bridget (LAW) <brhamill@law.nyc.gov>; Nelson, Genevieve (Law) <gnelson@law.nyc.gov>; Braun, Daniel (Law) <dbraun@law.nyc.gov>; Robinson, Amy (LAW) <arobinso@law.nyc.gov>; Ibrahim, Nadine (LAW) <nibrahim@law.nyc.gov>; NYC Law Protest Team <NYCLawProtestTeam@law.nyc.gov>

Cc: AG-NYPDLitigation <AG.NYPDLitigation@ag.ny.gov>; Gray Legal Team-External <GrayLegalTeam@dwt.com>; Hernandez Team <hernandez@femmelaw.com>; Molly Biklen <PayneLitigationTeam@nyclu.org>; Sierra Team <SierraTeam@moskovitzlaw.com>; Sow-Legal <Sow-Legal@blhny.com>; Wood <wood@klflaw.com>; rolonlegalteam@aboushi.com <rolonlegalteam@aboushi.com>; PBALitigationTeam@schlamstone.com <PBALitigationTeam@schlamstone.com>; Stephen Mc Quade <smcquade@pittalaw.com>; anthony.coles@dlapiper.com <anthony.coles@dlapiper.com>; aquinn@quinnlawny.com <aquinn@quinnlawny.com>; undefined <adifiore@quinnlawny.com>

Counsel,

I have not received any response to this request to meet and confer from Wednesday. I would also like to add to the proposed agenda for this meeting the City's response to Plaintiffs' Second Consolidated Interrogatories, served on June 9. This is the interrogatory seeking the names of all NYPD officials involved in the decision to abandon the Conforti report. The interrogatory states that Commissioner Shea made the final decision, but that is not responsive to the interrogatory's request to list all individuals involved in making that decision. We flagged at the time that the interrogatory was served that we would like to discuss this once the Conforti privilege log was finalized.

Please provide some dates and times early next week to meet and confer on these issues.

Corey

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**From:** Stoughton, Corey <CStoughton@legal-aid.org>

**Sent:** Wednesday, July 13, 2022 4:45 PM

**To:** Riordan, Shannon (LAW) <sriordan@law.nyc.gov>; Weng, Jenny (Law) <jweng@law.nyc.gov>; Hamill, Bridget (LAW) <brhamill@law.nyc.gov>; Nelson, Genevieve (Law) <gnelson@law.nyc.gov>; Braun, Daniel (Law) <dbraun@law.nyc.gov>; Robinson, Amy (LAW) <arobinso@law.nyc.gov>; Ibrahim, Nadine (LAW) <nibrahim@law.nyc.gov>; NYC Law Protest Team <NYCLawProtestTeam@law.nyc.gov>

**Cc:** AG-NYPDLitigation <AG.NYPDLitigation@ag.ny.gov>; Gray Legal Team-External <GrayLegalTeam@dwt.com>; Hernandez Team <hernandez@femmelaw.com>; Molly Biklen <PayneLitigationTeam@nyclu.org>; Sierra Team <SierraTeam@moskovitzlaw.com>; Sow-Legal <Sow-Legal@blhny.com>; Wood <wood@klflaw.com>; rolonlegalteam@aboushi.com <rolonlegalteam@aboushi.com>; PBALitigationTeam@schlamstone.com <PBALitigationTeam@schlamstone.com>; Stephen Mc Quade <smcquade@pittalaw.com>; anthony.coles@dlapiper.com <anthony.coles@dlapiper.com>; aquinn@quinnlawny.com <aquinn@quinnlawny.com>; undefined <adifiore@quinnlawny.com>

**Subject:** Re: [EXTERNAL] Re: In re: NYC Policing During Summer 2020 - Conforti Privilege Log

Shannon and Colleagues,

I appreciate the situation you are in with your training, but the court has a requirement to meet and confer within one business day on any discovery issue raised, and has repeatedly admonished plaintiffs for not raising discovery matters in a timely manner, and this information under discussion is critical to several upcoming depositions, so I am sure you can also appreciate the situation we are in as well. These don't feel like questions that require any investigation at all, let alone more than two weeks to investigate, and I was hoping by emailing them to get a response that might avoid the need for a further full-blown meet and confer, but if that is not possible then please consider this a request for a meet and confer on the issues raised below either with you or one of the other attorneys assigned to this matter.

Corey

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**From:** Riordan, Shannon (LAW) <sriordan@law.nyc.gov>

**Sent:** Wednesday, July 13, 2022 1:08 PM

**To:** Stoughton, Corey <CStoughton@legal-aid.org>; Weng, Jenny (Law) <jweng@law.nyc.gov>; Hamill, Bridget (LAW) <brhamill@law.nyc.gov>; Nelson, Genevieve (Law) <gnelson@law.nyc.gov>; Braun, Daniel (Law) <dbraun@law.nyc.gov>; Robinson, Amy (LAW) <arobinso@law.nyc.gov>; Ibrahim, Nadine (LAW) <nibrahim@law.nyc.gov>; NYC Law Protest Team <NYCLawProtestTeam@law.nyc.gov>

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**Subject:** RE: [EXTERNAL] Re: In re: NYC Policing During Summer 2020 - Conforti Privilege Log

Corey,

I have mandatory training over the next two weeks which is taking up a majority of my time. I will get back to you regarding these below questions during the week of July 25th as well when I have more time to further look into this.

Thank you,  
Shannon

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**From:** Stoughton, Corey <CStoughton@legal-aid.org>

**Sent:** Tuesday, July 12, 2022 12:56 PM

**To:** Riordan, Shannon (LAW) <sriordan@law.nyc.gov>; Weng, Jenny (Law) <jweng@law.nyc.gov>; Hamill, Bridget (LAW) <brhamill@law.nyc.gov>; Nelson, Genevieve (Law) <gnelson@law.nyc.gov>; Braun, Daniel (Law) <dbraun@law.nyc.gov>; Robinson, Amy (LAW) <arobinso@law.nyc.gov>; Ibrahim, Nadine (LAW) <nibrahim@law.nyc.gov>; NYC Law Protest Team <NYCLawProtestTeam@law.nyc.gov>

**Cc:** AG-NYPDLitigation <AG.NYPDLitigation@ag.ny.gov>; Gray Legal Team-External <GrayLegalTeam@dwt.com>; Hernandez Team <hernandez@femmelaw.com>; Molly Biklen <PayneLitigationTeam@nyclu.org>; Sierra Team <SierraTeam@moskovitzlaw.com>; Sow-Legal <Sow-Legal@blhny.com>; Wood <wood@klflaw.com>; rolonlegalteam@aboushi.com; PBALitigationTeam@schlamstone.com; Stephen Mc Quade <smcquade@pittalaw.com>; anthony.coles@dlapiper.com; aquinn@quinnlawny.com; undefined <adifiore@quinnlawny.com>

**Subject:** Re: [EXTERNAL] Re: In re: NYC Policing During Summer 2020 - Conforti Privilege Log

Shannon,

Thanks for this response. Given that it's only a handful of documents, can you explain why the City needs more than a month since it determined to reclassify these documents to produce them?

Beyond that, we have a few questions about the June 24 log that we would be grateful for an answer to this week:

1. Can you please clarify the scope of what will be produced? In particular, Documents 46, 47 and 50 from the April 19, 2022 privilege log are no longer listed in the June 24, 2022 log, but also are not listed among those the City has agreed to produce. Are those documents now going to be produced, and if so, when? If not, what is the basis for removing them from the privilege log?
- 2.
3. What is the City's basis for withholding new Documents 36-39 from the June 24 privilege log, given that, even if they contain law enforcement-related material, they are directly relevant to the claims and defenses in this matter?
- 4.
5. Why were these documents not previously identified in the responses to Plaintiffs' original consolidated document demands, served in 2020? These highly relevant documents appear to only have been discovered in the possession of Chief Conforti even though their original custodians (including leadership of Patrol Bureau Manhattan South and the Midtown South precinct, the Intelligence Bureau and the SMART Social Media Analysis & Research Team) should have been searched as custodians of relevant information for the original document requests. We would like an explanation for how and why these documents were not identified previously.

Thanks,  
Corey

1.

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**From:** Riordan, Shannon (LAW) <[sriordan@law.nyc.gov](mailto:sriordan@law.nyc.gov)>  
**Sent:** Monday, July 11, 2022 4:43 PM  
**To:** Stoughton, Corey <[CStoughton@legal-aid.org](mailto:CStoughton@legal-aid.org)>; Weng, Jenny (Law) <[jweng@law.nyc.gov](mailto:jweng@law.nyc.gov)>; Hamill, Bridget (LAW) <[brhamill@law.nyc.gov](mailto:brhamill@law.nyc.gov)>; Nelson, Genevieve (Law) <[gnelson@law.nyc.gov](mailto:gnelson@law.nyc.gov)>; Braun, Daniel (Law) <[dbraun@law.nyc.gov](mailto:dbraun@law.nyc.gov)>; Robinson, Amy (LAW) <[arobinso@law.nyc.gov](mailto:arobinso@law.nyc.gov)>; Ibrahim, Nadine (LAW) <[nibrahim@law.nyc.gov](mailto:nibrahim@law.nyc.gov)>; NYC Law Protest Team <[NYCLawProtestTeam@law.nyc.gov](mailto:NYCLawProtestTeam@law.nyc.gov)>  
**Cc:** AG-NYPDLitigation <[AG.NYPDLitigation@ag.ny.gov](mailto:AG.NYPDLitigation@ag.ny.gov)>; Gray Legal Team-External <[GrayLegalTeam@dwt.com](mailto:GrayLegalTeam@dwt.com)>; Hernandez Team <[hernandez@femmelaw.com](mailto:hernandez@femmelaw.com)>; Molly Biklen <[PayneLitigationTeam@nyclu.org](mailto:PayneLitigationTeam@nyclu.org)>; Sierra Team <[SierraTeam@moskovitzlaw.com](mailto:SierraTeam@moskovitzlaw.com)>; Sow-Legal <[Sow-Legal@blhny.com](mailto:Sow-Legal@blhny.com)>; Wood <[wood@klflaw.com](mailto:wood@klflaw.com)>; [rolonlegalteam@aboushi.com](mailto:rolonlegalteam@aboushi.com) <[rolonlegalteam@aboushi.com](mailto:rolonlegalteam@aboushi.com)>; [PBALitigationTeam@schlamstone.com](mailto:PBALitigationTeam@schlamstone.com) <[PBALitigationTeam@schlamstone.com](mailto:PBALitigationTeam@schlamstone.com)>; Stephen Mc Quade <[smcquade@pittalaw.com](mailto:smcquade@pittalaw.com)>; [anthony.coles@dlapiper.com](mailto:anthony.coles@dlapiper.com) <[anthony.coles@dlapiper.com](mailto:anthony.coles@dlapiper.com)>; [aquinn@quinnlawny.com](mailto:aquinn@quinnlawny.com) <[aquinn@quinnlawny.com](mailto:aquinn@quinnlawny.com)>; undefined <[adifiore@quinnlawny.com](mailto:adifiore@quinnlawny.com)>  
**Subject:** RE: [EXTERNAL] Re: In re: NYC Policing During Summer 2020 - Conforti Privilege Log

Hi Corey,

I will be mainly handling the Conforti documents. I am anticipating that I will be able to have them reviewed, properly redacted, and sent out for production by July 25<sup>th</sup>. Once you've had an opportunity to review the production we can set a meet and confer time if need be.

Thanks,  
Shannon

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**From:** Stoughton, Corey <[CStoughton@legal-aid.org](mailto:CStoughton@legal-aid.org)>

**Sent:** Monday, July 11, 2022 4:37 PM

**To:** Breslow, Stephanie (Law) <[sbreslow@law.nyc.gov](mailto:sbreslow@law.nyc.gov)>; Weng, Jenny (Law) <[jweng@law.nyc.gov](mailto:jweng@law.nyc.gov)>; Hamill, Bridget (LAW) <[brhamill@law.nyc.gov](mailto:brhamill@law.nyc.gov)>; Nelson, Genevieve (Law) <[gnelson@law.nyc.gov](mailto:gnelson@law.nyc.gov)>; Braun, Daniel (Law) <[dbraun@law.nyc.gov](mailto:dbraun@law.nyc.gov)>; Riordan, Shannon (LAW) <[sriordan@law.nyc.gov](mailto:sriordan@law.nyc.gov)>; Robinson, Amy (LAW) <[arobinso@law.nyc.gov](mailto:arobinso@law.nyc.gov)>; Ibrahim, Nadine (LAW) <[nibrahim@law.nyc.gov](mailto:nibrahim@law.nyc.gov)>; NYC Law Protest Team <[NYCLawProtestTeam@law.nyc.gov](mailto:NYCLawProtestTeam@law.nyc.gov)>

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**Subject:** Re: [EXTERNAL] Re: In re: NYC Policing During Summer 2020 - Conforti Privilege Log

Counsel,

I am re-upping the email below from last Thursday, having received no response. Can you please advise who from the City is handling this matter and provide a date certain, no later than the end of this week, when the documents now promised more than 2 weeks ago will be produced?

Corey

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**From:** Stoughton, Corey <[CStoughton@legal-aid.org](mailto:CStoughton@legal-aid.org)>

**Sent:** Thursday, July 7, 2022 3:34 PM

**To:** Breslow, Stephanie (Law) <[sbreslow@law.nyc.gov](mailto:sbreslow@law.nyc.gov)>; Weng, Jenny (Law) <[jweng@law.nyc.gov](mailto:jweng@law.nyc.gov)>; Hamill, Bridget (LAW) <[brhamill@law.nyc.gov](mailto:brhamill@law.nyc.gov)>; Nelson, Genevieve (Law) <[gnelson@law.nyc.gov](mailto:gnelson@law.nyc.gov)>; Braun, Daniel (Law) <[dbraun@law.nyc.gov](mailto:dbraun@law.nyc.gov)>; Riordan, Shannon (LAW) <[sriordan@law.nyc.gov](mailto:sriordan@law.nyc.gov)>; Robinson, Amy (LAW) <[arobinso@law.nyc.gov](mailto:arobinso@law.nyc.gov)>; Ibrahim, Nadine (LAW) <[nibrahim@law.nyc.gov](mailto:nibrahim@law.nyc.gov)>; NYC Law Protest Team <[NYCLawProtestTeam@law.nyc.gov](mailto:NYCLawProtestTeam@law.nyc.gov)>

**Cc:** AG-NYPDLitigation <[AG.NYPDLitigation@ag.ny.gov](mailto:AG.NYPDLitigation@ag.ny.gov)>; Gray Legal Team-External <[GrayLegalTeam@dwt.com](mailto:GrayLegalTeam@dwt.com)>; Hernandez Team <[hernandez@femmelaw.com](mailto:hernandez@femmelaw.com)>; Molly Biklen <[PayneLitigationTeam@nyclu.org](mailto:PayneLitigationTeam@nyclu.org)>; Sierra Team <[SierraTeam@moskovitzlaw.com](mailto:SierraTeam@moskovitzlaw.com)>; Sow-Legal <[Sow-Legal@blhny.com](mailto:Sow-Legal@blhny.com)>; Wood <[wood@klflaw.com](mailto:wood@klflaw.com)>; [rolonlegalteam@aboushi.com](mailto:rolonlegalteam@aboushi.com) <[rolonlegalteam@aboushi.com](mailto:rolonlegalteam@aboushi.com)>; [PBALitigationTeam@schlamstone.com](mailto:PBALitigationTeam@schlamstone.com) <[PBALitigationTeam@schlamstone.com](mailto:PBALitigationTeam@schlamstone.com)>; Stephen Mc Quade <[SMcQuade@pittalaw.com](mailto:SMcQuade@pittalaw.com)>; [anthony.coles@dlapiper.com](mailto:anthony.coles@dlapiper.com) <[anthony.coles@dlapiper.com](mailto:anthony.coles@dlapiper.com)>; [aquinn@quinnlawny.com](mailto:aquinn@quinnlawny.com) <[aquinn@quinnlawny.com](mailto:aquinn@quinnlawny.com)>; undefined <[adifiore@quinnlawny.com](mailto:adifiore@quinnlawny.com)>

**Subject:** Re: [EXTERNAL] Re: In re: NYC Policing During Summer 2020 - Conforti Privilege Log

Counsel,

Plaintiffs have reviewed the revised Conforti/after-action review materials sent by Stephanie Breslow before her departure. There remain a few issues to discuss, but as an initial matter, who is leading on this issue now that Stephanie has left? And when will Defendants produce the list of documents the City agreed to downgrade from full withholding to producing with redactions? It would be most efficient to meet and confer on this issue after those documents have been produced so that we can address issues with the scope of redactions at the same time (if any).

Thanks,

Corey

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**From:** Breslow, Stephanie (Law) <[sbreslow@law.nyc.gov](mailto:sbreslow@law.nyc.gov)>

**Sent:** Saturday, June 25, 2022 12:25 AM

**To:** Stoughton, Corey <[CStoughton@legal-aid.org](mailto:CStoughton@legal-aid.org)>; Weng, Jenny (Law) <[jweng@law.nyc.gov](mailto:jweng@law.nyc.gov)>; Hamill, Bridget (LAW) <[brhamill@law.nyc.gov](mailto:brhamill@law.nyc.gov)>; Nelson, Genevieve (Law) <[gnelson@law.nyc.gov](mailto:gnelson@law.nyc.gov)>; Braun, Daniel (Law) <[dbraun@law.nyc.gov](mailto:dbraun@law.nyc.gov)>; Riordan, Shannon (LAW) <[sriordan@law.nyc.gov](mailto:sriordan@law.nyc.gov)>; Robinson, Amy (LAW) <[arobinso@law.nyc.gov](mailto:arobinso@law.nyc.gov)>; Ibrahim, Nadine (LAW) <[nibrahim@law.nyc.gov](mailto:nibrahim@law.nyc.gov)>

**Cc:** AG-NYPDLitigation <[AG.NYPDLitigation@ag.ny.gov](mailto:AG.NYPDLitigation@ag.ny.gov)>; Gray Legal Team-External <[GrayLegalTeam@dwt.com](mailto:GrayLegalTeam@dwt.com)>; Hernandez Team <[hernandez@femmelaw.com](mailto:hernandez@femmelaw.com)>; Molly Biklen <[PayneLitigationTeam@nyclu.org](mailto:PayneLitigationTeam@nyclu.org)>; Sierra Team <[SierraTeam@moskovitzlaw.com](mailto:SierraTeam@moskovitzlaw.com)>; Sow-Legal <[Sow-Legal@blhny.com](mailto:Sow-Legal@blhny.com)>; Wood <[wood@klflaw.com](mailto:wood@klflaw.com)>; [rolonlegalteam@aboushi.com](mailto:rolonlegalteam@aboushi.com) <[rolonlegalteam@aboushi.com](mailto:rolonlegalteam@aboushi.com)>

**Subject:** RE: [EXTERNAL] Re: In re: NYC Policing During Summer 2020 - Conforti Privilege Log

Corey,

Please find attached defendants' updated privilege log for the Conforti Report and related documents, reflecting changes previously agreed upon by the parties.

As certain documents have been removed from the privilege log, the numbering of the documents has changed from prior versions of the log. In order to facilitate identification of the documents referenced in plaintiffs' clarification questions, defendants have provided the document names and new log numbers (from the updated log produced herewith) that correspond to the old log numbers used by plaintiffs in the clarification questions. Plaintiffs' questions and defendants' "conversion key" indicating the document name and updated log number for all documents referenced in the clarification questions are pasted below.

Please let defendants know should plaintiffs have any questions, but be sure to "reply all," as the undersigned will no longer be working for the Law Department as of next week.

Best,

Stephanie

#### **Clarification as to Other Documents**

- Can Defendants confirm that Document 11's summary of the "main takeaways" of the Conforti report discuss only proposed policy or practice recommendations and are not factual "takeaways" about events that occurred during the protests?
  - **Document name and new log number:** "After Action Discussion Document," #6
- Likewise, can Defendants confirm that Document 27 is solely limited to draft recommendations?
  - **Document name and new log number:** "Recommendation," #21
- Likewise can Defendant confirm that Document 44 – DC Andrews's draft forward to the report – does not contain any factual information (or at least any factual information not also contained in the main draft report).
  - **Document name and new log number:** "Draft Forward to After Action Report – Email From Andrew, William," #32
- Can Defendants confirm that Documents 17, 20-26, and 37-39 and Documents 42, 46 and 47 are marked-up versions of either Document 1 or Document 9, and that the mark-ups from Andrews, Miller and/or Mauro and Chernyavsky and whomever did the markups on Documents 46 and 47 do not contain any distinct factual information? Similarly, can Defendants confirm that Document 36 – the email chain with DC Miller – contains solely DC Miller's proposed edits to Document 1 or 9 and/or expressions of his personal opinions of the review process and does not contain any distinct factual information?

- **Document names and new log numbers:**
  - 17: "After Action Andrews," #11
  - 20: "NYPD half and half Andrews edits," #14
  - 21: "NYPD half and half," #15
  - 22: "NYPD half and half Andrews edits finalIII," #16
  - 23: "NYPD half and half Andrews edits final," #17
  - 24: "After Action Plan Near final 1," #18
  - 25: "After Action Plan Near final," #19
  - 26: "After Action Plan Near final. Andrews," #20
  - 37: "Mark-up of Draft Conforti Report dated 9/11/20," #27
    - Note this document has been renamed in this updated version of the log, for clarity and accuracy. In defendants' Second Amended Privilege Log (Version Two) produced on April 19, 2022, this document was designated, "Incomplete draft of after action report 9/11/20 – Andrews feedback."
  - 38: "Mark-up of Draft Conforti Report dated 8/11/20," #28
    - Note this document has been renamed in this updated version of the log, for clarity and accuracy. In defendants' Second Amended Privilege Log (Version Two) produced on April 19, 2022, this document was designated, "Incomplete draft of after action report 9/11/20 – Miller feedback."
  - 39: This entry was discovered to be an inadvertent duplicate of entry #37 above, and has been deleted accordingly.
  - 42: "After Action Report Edits – Email Thread From Chernyavsky, Oleg," #31
- Can Defendants confirm that Document 18, 19, 28, 29 and 34 are, in essence, rough sketches of material that appears in Documents 1 or 9 and do not contain any distinct factual information?
  - **Document names and new log numbers:**
    - 18: "misc," #12
    - 19: "miscii," #13
    - 28: "nypd addd," #22
    - 29: "Additional Findings," #23
    - 34: "After Action," #25
- Can Defendants confirm that Documents 40 and 41 contain no factual information, or at least no factual information not also contained in Document 35? Document 40 appears to be a draft of Document 35 and Document 41 appears to be Conforti's notes for the presentation represented by Document 35.
  - **Document names and new log numbers:**
    - 40: "After Action Summary – Direction of the Police Commissioner," #29
    - 41: "George Floyd After-Action Discussion," #30

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**From:** Stoughton, Corey <[CStoughton@legal-aid.org](mailto:CStoughton@legal-aid.org)>

**Sent:** Tuesday, June 21, 2022 1:32 PM

**To:** Weng, Jenny (Law) <[jweng@law.nyc.gov](mailto:jweng@law.nyc.gov)>; Breslow, Stephanie (Law) <[sbreslow@law.nyc.gov](mailto:sbreslow@law.nyc.gov)>; Hamill, Bridget (LAW) <[brhamill@law.nyc.gov](mailto:brhamill@law.nyc.gov)>; Nelson, Genevieve (Law) <[gnelson@law.nyc.gov](mailto:gnelson@law.nyc.gov)>; Braun, Daniel (Law) <[dbraun@law.nyc.gov](mailto:dbraun@law.nyc.gov)>; Riordan, Shannon (LAW) <[sriordan@law.nyc.gov](mailto:sriordan@law.nyc.gov)>; Robinson, Amy (LAW) <[arobinso@law.nyc.gov](mailto:arobinso@law.nyc.gov)>; Ibrahim, Nadine (LAW) <[nibrahim@law.nyc.gov](mailto:nibrahim@law.nyc.gov)>

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**Subject:** [EXTERNAL] Re: In re: NYC Policing During Summer 2020 - Conforti Privilege Log

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Thanks for the update, Jenny.

Corey

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**From:** Weng, Jenny (Law) <[jweng@law.nyc.gov](mailto:jweng@law.nyc.gov)>

**Sent:** Tuesday, June 21, 2022 1:27 PM

**To:** Breslow, Stephanie (Law) <[sbreslow@law.nyc.gov](mailto:sbreslow@law.nyc.gov)>; Stoughton, Corey <[CStoughton@legal-aid.org](mailto:CStoughton@legal-aid.org)>; Hamill, Bridget (LAW) <[brhamill@law.nyc.gov](mailto:brhamill@law.nyc.gov)>; Nelson, Genevieve (Law) <[gnelson@law.nyc.gov](mailto:gnelson@law.nyc.gov)>; Braun, Daniel (Law) <[dbraun@law.nyc.gov](mailto:dbraun@law.nyc.gov)>; Riordan, Shannon (LAW) <[sriordan@law.nyc.gov](mailto:sriordan@law.nyc.gov)>; Robinson, Amy (LAW) <[arobinso@law.nyc.gov](mailto:arobinso@law.nyc.gov)>; Ibrahim, Nadine (LAW) <[nibrahim@law.nyc.gov](mailto:nibrahim@law.nyc.gov)>

**Cc:** AG-NYPDLitigation <[AG.NYPDLitigation@ag.ny.gov](mailto:AG.NYPDLitigation@ag.ny.gov)>; Gray Legal Team-External <[GrayLegalTeam@dwt.com](mailto:GrayLegalTeam@dwt.com)>; Hernandez Team <[hernandez@femmelaw.com](mailto:hernandez@femmelaw.com)>; Molly Biklen <[PayneLitigationTeam@nyclu.org](mailto:PayneLitigationTeam@nyclu.org)>; Sierra Team <[SierraTeam@moskovitzlaw.com](mailto:SierraTeam@moskovitzlaw.com)>; Sow-Legal <[Sow-Legal@blhny.com](mailto:Sow-Legal@blhny.com)>; Wood <[wood@klflaw.com](mailto:wood@klflaw.com)>; [rolonlegalteam@aboushi.com](mailto:rolonlegalteam@aboushi.com) <[rolonlegalteam@aboushi.com](mailto:rolonlegalteam@aboushi.com)>

**Subject:** RE: In re: NYC Policing During Summer 2020 - Conforti Privilege Log

Corey,

Stephanie is still out sick and I understand the updated privilege log is due today. The updated privilege log will be produced to plaintiffs this Friday as she hopes to be able to work tomorrow. Thank you.

---

**From:** Weng, Jenny (Law) <[jweng@law.nyc.gov](mailto:jweng@law.nyc.gov)>

**Sent:** Friday, June 17, 2022 7:51 PM

**To:** Breslow, Stephanie (Law) <[sbreslow@law.nyc.gov](mailto:sbreslow@law.nyc.gov)>; Stoughton, Corey <[CStoughton@legal-aid.org](mailto:CStoughton@legal-aid.org)>; Hamill, Bridget (LAW) <[brhamill@law.nyc.gov](mailto:brhamill@law.nyc.gov)>; Nelson, Genevieve (Law) <[gnelson@law.nyc.gov](mailto:gnelson@law.nyc.gov)>; Braun, Daniel (Law) <[dbraun@law.nyc.gov](mailto:dbraun@law.nyc.gov)>; Riordan, Shannon (LAW) <[sriordan@law.nyc.gov](mailto:sriordan@law.nyc.gov)>; Robinson, Amy (LAW) <[arobinso@law.nyc.gov](mailto:arobinso@law.nyc.gov)>; Ibrahim, Nadine (LAW) <[nibrahim@law.nyc.gov](mailto:nibrahim@law.nyc.gov)>

**Cc:** AG-NYPDLitigation <[AG.NYPDLitigation@ag.ny.gov](mailto:AG.NYPDLitigation@ag.ny.gov)>; Gray Legal Team-External <[GrayLegalTeam@dwt.com](mailto:GrayLegalTeam@dwt.com)>; Hernandez Team <[hernandez@femmelaw.com](mailto:hernandez@femmelaw.com)>; Molly Biklen <[PayneLitigationTeam@nyclu.org](mailto:PayneLitigationTeam@nyclu.org)>; Sierra Team <[SierraTeam@moskovitzlaw.com](mailto:SierraTeam@moskovitzlaw.com)>; Sow-Legal <[Sow-Legal@blhny.com](mailto:Sow-Legal@blhny.com)>; Wood <[wood@klflaw.com](mailto:wood@klflaw.com)>; [rolonlegalteam@aboushi.com](mailto:rolonlegalteam@aboushi.com)

**Subject:** Re: In re: NYC Policing During Summer 2020 - Conforti Privilege Log

Corey,

Stephanie is out sick today but I wanted to let you know that plaintiffs will be provided with Chief Conforti's supplemental affidavit by Weds, June 29th. Thanks.

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---

**From:** Breslow, Stephanie (Law) <[sbreslow@law.nyc.gov](mailto:sbreslow@law.nyc.gov)>

**Sent:** Wednesday, June 15, 2022 8:45 AM

**To:** Stoughton, Corey <[CStoughton@legal-aid.org](mailto:CStoughton@legal-aid.org)>; Weng, Jenny (Law) <[jweng@law.nyc.gov](mailto:jweng@law.nyc.gov)>; Hamill, Bridget (LAW) <[brhamill@law.nyc.gov](mailto:brhamill@law.nyc.gov)>; Nelson, Genevieve (Law) <[gnelson@law.nyc.gov](mailto:gnelson@law.nyc.gov)>; Braun, Daniel (Law) <[dbraun@law.nyc.gov](mailto:dbraun@law.nyc.gov)>; Riordan, Shannon (LAW) <[sriordan@law.nyc.gov](mailto:sriordan@law.nyc.gov)>; Robinson, Amy (LAW) <[arobinso@law.nyc.gov](mailto:arobinso@law.nyc.gov)>; Ibrahim, Nadine (LAW) <[nibrahim@law.nyc.gov](mailto:nibrahim@law.nyc.gov)>

**Cc:** AG-NYPDLitigation <[AG.NYPDLitigation@ag.ny.gov](mailto:AG.NYPDLitigation@ag.ny.gov)>; Gray Legal Team-External <[GrayLegalTeam@dwt.com](mailto:GrayLegalTeam@dwt.com)>; Hernandez Team <[hernandez@femmelaw.com](mailto:hernandez@femmelaw.com)>; Molly Biklen <[PayneLitigationTeam@nyclu.org](mailto:PayneLitigationTeam@nyclu.org)>; Sierra Team <[SierraTeam@moskovitzlaw.com](mailto:SierraTeam@moskovitzlaw.com)>; Sow-Legal <[Sow-Legal@blhny.com](mailto:Sow-Legal@blhny.com)>; Wood <[wood@klflaw.com](mailto:wood@klflaw.com)>; [rolonlegalteam@aboushi.com](mailto:rolonlegalteam@aboushi.com) <[rolonlegalteam@aboushi.com](mailto:rolonlegalteam@aboushi.com)>

**Subject:** RE: In re: NYC Policing During Summer 2020 - Conforti Privilege Log

Corey,

Defendants will provide an updated privilege log by next Tuesday, June 21. We'll provide a date certain by which we will produce Chief Conforti's supplemental affidavit no later than this Friday, June 17. (As the Chief is retired, his schedule has been a bit complicated to coordinate.)

Best,

Stephanie

---

**From:** Stoughton, Corey <[CStoughton@legal-aid.org](mailto:CStoughton@legal-aid.org)>

**Sent:** Monday, June 13, 2022 12:38 PM

**To:** Breslow, Stephanie (Law) <[sbreslow@law.nyc.gov](mailto:sbreslow@law.nyc.gov)>; Weng, Jenny (Law) <[jweng@law.nyc.gov](mailto:jweng@law.nyc.gov)>; Hamill, Bridget (LAW) <[brhamill@law.nyc.gov](mailto:brhamill@law.nyc.gov)>; Nelson, Genevieve (Law) <[gnelson@law.nyc.gov](mailto:gnelson@law.nyc.gov)>; Braun, Daniel (Law) <[dbraun@law.nyc.gov](mailto:dbraun@law.nyc.gov)>; Riordan, Shannon (LAW) <[sriordan@law.nyc.gov](mailto:sriordan@law.nyc.gov)>; Robinson, Amy (LAW) <[arobinso@law.nyc.gov](mailto:arobinso@law.nyc.gov)>; Ibrahim, Nadine (LAW) <[nibrahim@law.nyc.gov](mailto:nibrahim@law.nyc.gov)>

**Cc:** AG-NYPDLitigation <[AG.NYPDLitigation@ag.ny.gov](mailto:AG.NYPDLitigation@ag.ny.gov)>; Gray Legal Team-External <[GrayLegalTeam@dwt.com](mailto:GrayLegalTeam@dwt.com)>; Hernandez Team <[hernandez@femmelaw.com](mailto:hernandez@femmelaw.com)>; Molly Biklen <[PayneLitigationTeam@nyclu.org](mailto:PayneLitigationTeam@nyclu.org)>; Sierra Team <[SierraTeam@moskovitzlaw.com](mailto:SierraTeam@moskovitzlaw.com)>; Sow-Legal <[Sow-Legal@blhny.com](mailto:Sow-Legal@blhny.com)>; Wood <[wood@klflaw.com](mailto:wood@klflaw.com)>; [rolonlegalteam@aboushi.com](mailto:rolonlegalteam@aboushi.com)

**Subject:** [EXTERNAL] Re: In re: NYC Policing During Summer 2020 - Conforti Privilege Log

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Stephanie,

Thank you for this response. Can you please provide a date certain for the production of the updated privilege log and the amended Conforti affirmation?

Thanks,  
Corey

---

**From:** Breslow, Stephanie (Law) <[sbreslow@law.nyc.gov](mailto:sbreslow@law.nyc.gov)>

**Sent:** Wednesday, June 8, 2022 11:37 PM

**To:** Stoughton, Corey <[CStoughton@legal-aid.org](mailto:CStoughton@legal-aid.org)>; Weng, Jenny (Law) <[jweng@law.nyc.gov](mailto:jweng@law.nyc.gov)>; Hamill, Bridget (LAW) <[brhamill@law.nyc.gov](mailto:brhamill@law.nyc.gov)>; Nelson, Genevieve (Law) <[gnelson@law.nyc.gov](mailto:gnelson@law.nyc.gov)>; Braun, Daniel (Law) <[dbraun@law.nyc.gov](mailto:dbraun@law.nyc.gov)>; Riordan, Shannon (LAW) <[sriordan@law.nyc.gov](mailto:sriordan@law.nyc.gov)>; Robinson, Amy (LAW) <[arobinso@law.nyc.gov](mailto:arobinso@law.nyc.gov)>; Ibrahim, Nadine (LAW) <[nibrahim@law.nyc.gov](mailto:nibrahim@law.nyc.gov)>

**Cc:** AG-NYPDLitigation <[ag.nypdlitigation@ag.ny.gov](mailto:ag.nypdlitigation@ag.ny.gov)>; Gray Legal Team-External <[GrayLegalTeam@dwt.com](mailto:GrayLegalTeam@dwt.com)>; Hernandez Team <[hernandez@femmelaw.com](mailto:hernandez@femmelaw.com)>; Molly Biklen <[PayneLitigationTeam@nyclu.org](mailto:PayneLitigationTeam@nyclu.org)>; Sierra Team <[SierraTeam@moskovitzlaw.com](mailto:SierraTeam@moskovitzlaw.com)>; Sow-Legal <[Sow-Legal@blhny.com](mailto:Sow-Legal@blhny.com)>; Wood <[wood@klflaw.com](mailto:wood@klflaw.com)>; [rolonlegalteam@aboushi.com](mailto:rolonlegalteam@aboushi.com) <[rolonlegalteam@aboushi.com](mailto:rolonlegalteam@aboushi.com)>

**Subject:** RE: In re: NYC Policing During Summer 2020 - Conforti Privilege Log

Corey,

Please see Defendants' responses to Plaintiffs' questions regarding our previously produced privilege logs relating to the draft Conforti Report, which we've inserted into your May 26 email below, in blue font.

Best,

Stephanie

---

**From:** Stoughton, Corey <[CStoughton@legal-aid.org](mailto:CStoughton@legal-aid.org)>

**Sent:** Thursday, May 26, 2022 5:17 PM

**To:** Breslow, Stephanie (Law) <[sbreslow@law.nyc.gov](mailto:sbreslow@law.nyc.gov)>; Weng, Jenny (Law) <[jweng@law.nyc.gov](mailto:jweng@law.nyc.gov)>; Hamill, Bridget (LAW) <[brhamill@law.nyc.gov](mailto:brhamill@law.nyc.gov)>; Nelson, Genevieve (Law) <[gnelson@law.nyc.gov](mailto:gnelson@law.nyc.gov)>; Braun, Daniel (Law) <[dbraun@law.nyc.gov](mailto:dbraun@law.nyc.gov)>; Riordan, Shannon (LAW) <[sriordan@law.nyc.gov](mailto:sriordan@law.nyc.gov)>; Robinson, Amy (LAW) <[arobinso@law.nyc.gov](mailto:arobinso@law.nyc.gov)>; Ibrahim, Nadine (LAW) <[nibrahim@law.nyc.gov](mailto:nibrahim@law.nyc.gov)>

**Cc:** AG-NYPDLitigation <[ag.nypdlitigation@ag.ny.gov](mailto:ag.nypdlitigation@ag.ny.gov)>; Gray Legal Team-External <[GrayLegalTeam@dwt.com](mailto:GrayLegalTeam@dwt.com)>; Hernandez Team <[hernandez@femmelaw.com](mailto:hernandez@femmelaw.com)>; Molly Biklen <[PayneLitigationTeam@nyclu.org](mailto:PayneLitigationTeam@nyclu.org)>; Sierra Team <[SierraTeam@moskovitzlaw.com](mailto:SierraTeam@moskovitzlaw.com)>; Sow-Legal <[Sow-Legal@blhny.com](mailto:Sow-Legal@blhny.com)>; Wood <[wood@klflaw.com](mailto:wood@klflaw.com)>; [rolonlegalteam@aboushi.com](mailto:rolonlegalteam@aboushi.com)

**Subject:** [EXTERNAL] Re: In re: NYC Policing During Summer 2020 - Conforti Privilege Log

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Stephanie,

Thank you again for your time today discussing the Conforti privilege log. I'm following up to memorialize what occurred and next steps. Please let me know if I missed anything. Please also do remember to send the case you were looking for on the segregability analysis - we are happy to consider that and any other authority you have on that question.

1. The parties are at an impasse as to whether Defendants have properly invoked privilege to withhold in full documents 1-3, 9, 12-14, 16, 30, 33 and 43.

Based on the parties' meet and confer on May 26, Defendants have re-reviewed all documents included in our "Second Amended Privilege Log, Version Two," dated April 19, 2022, and our supplement to that privilege log dated May 16, 2022, with Plaintiffs' counsel's comments in mind.

Defendants agree to downgrade the following documents previously withheld in full and will produce the same with redactions, together with a revised privilege log reflecting the updated set of documents withheld due to privilege.

- #2
- #6
- #7
- #8
- #10
- #15
- #31
- #32
- #33
- #36
- #43

Defendants maintain their assertion of deliberative process privilege as to the balance of the documents, which continue to be withheld in full and will be accounted for in the updated privilege log.

1. Defendants will get back to Plaintiffs by Friday June 3 as to its position on the following:
  - Producing, in whole or in part, Documents 4, 6-8, 10, 15, 31-32, 35, and 45 (please note I forgot to list documents 31 & 32 in this category when I tried to summarize at the end of our call, but we understand them to be on your "undetermined list");  
[See Defendants' response to Plaintiffs' Point No. 1, above.](#)
  - Whether Defendants will produce an index of all the documents in the box and hard drive referenced in paragraph 17 of the Conforti Affirmation, in the form of an amended or supplemental affirmation from Chief Conforti, particularly given that there has already been revealed to be a gap between documents in those locations and what was initially produced and listed in the privilege log;  
[Defendants will provide an index of all documents in the box and hard drive referenced in paragraph 17 of the Conforti Affidavit, in the form of a supplemental affidavit from Chief Conforti.](#)
  - Whether Defendants will produce an affirmation answering the questions reproduced below from my May 3 email under the heading "Clarification as to Other Documents", with the addition in italics of relevant document numbers from the supplemental privilege log produced subsequent to that email; or in the alternative to an affirmation agree to amend the privilege log with answers to these questions.  
[Defendants agree to provide an updated privilege log with entries for all documents referenced in Plaintiffs' "clarification" questions, amended to incorporate information and details responsive to those questions.](#)

2. If Defendants are unwilling to produce (in whole or part) the documents listed in (2) above, unwilling to produce the index, and/or will not provide any written answers to the questions below, then the parties are at an impasse as to those matters.

[Per Defendants' response to Plaintiffs' Point No. 1 above, the parties appear to remain at an impasse with regard to the following documents:](#)

[#1](#)  
[#3](#)  
[#9](#)  
[#12](#)  
[#13](#)  
[#14](#)  
[#16](#)  
[#30](#)

### **Clarification as to Other Documents**

We would like to ask for clarification as to several of the remaining documents in the privilege log in order to assess your claim of privilege. The questions we have as to those documents are as follows:

- Can Defendants confirm that Document 11's summary of the "main takeaways" of the Conforti report discuss only proposed policy or practice recommendations and are not factual "takeaways" about events that occurred during the protests? Likewise, can Defendants confirm that Document 27 is solely limited to draft recommendations? *Likewise can Defendant confirm that Document 44 – DC Andrews's draft forward to the report – does not contain any factual information (or at least any factual information not also contained in the main draft report).*
- Can Defendants confirm that Documents 17, 20-26, and 37-39 and Documents 42, 46 and 47 are marked-up versions of either Document 1 or Document 9, and that the mark-ups from Andrews, Miller and/or Mauro and Chernyavsky and whomever did the markups on Documents 46 and 47 do not contain any distinct factual information? Similarly, can Defendants confirm that Document 36

– the email chain with DC Miller – contains solely DC Miller’s proposed edits to Document 1 or 9 and/or expressions of his personal opinions of the review process and does not contain any distinct factual information?

- Can Defendants confirm that Document 18, 19, 28, 29 and 34 are, in essence, rough sketches of material that appears in Documents 1 or 9 and do not contain any distinct factual information?
- *Can Defendants confirm that Documents 40 and 41 contain no factual information, or at least no factual information not also contained in Document 35? Document 40 appears to be a draft of Document 35 and Document 41 appears to be Conforti’s notes for the presentation represented by Document 35.*

As to Document #36, see Defendants’ response to Plaintiffs’ Point No. 1, above.

As to the remainder of the documents referenced in the list of questions above, see Defendants’ response to bullet 3 of Plaintiffs’ Point No. 2.

---

**From:** Stoughton, Corey <[CStoughton@legal-aid.org](mailto:CStoughton@legal-aid.org)>

**Sent:** Monday, May 23, 2022 6:24 PM

**To:** Breslow, Stephanie (Law) <[sbreslow@law.nyc.gov](mailto:sbreslow@law.nyc.gov)>; Weng, Jenny (Law) <[jweng@law.nyc.gov](mailto:jweng@law.nyc.gov)>; Hamill, Bridget (LAW) <[brhamill@law.nyc.gov](mailto:brhamill@law.nyc.gov)>; Nelson, Genevieve (Law) <[gnelson@law.nyc.gov](mailto:gnelson@law.nyc.gov)>; Braun, Daniel (Law) <[dbraun@law.nyc.gov](mailto:dbraun@law.nyc.gov)>; Riordan, Shannon (LAW) <[sriordan@law.nyc.gov](mailto:sriordan@law.nyc.gov)>; Robinson, Amy (LAW) <[arobinso@law.nyc.gov](mailto:arobinso@law.nyc.gov)>; Ibrahim, Nadine (LAW) <[nibrahim@law.nyc.gov](mailto:nibrahim@law.nyc.gov)>

**Cc:** AG-NYPDLitigation <[ag.nypdlitigation@ag.ny.gov](mailto:ag.nypdlitigation@ag.ny.gov)>; Gray Legal Team-External <[GrayLegalTeam@dwt.com](mailto:GrayLegalTeam@dwt.com)>; Hernandez Team <[hernandez@femmelaw.com](mailto:hernandez@femmelaw.com)>; Molly Biklen <[PayneLitigationTeam@nyclu.org](mailto:PayneLitigationTeam@nyclu.org)>; Sierra Team <[SierraTeam@moskovitzlaw.com](mailto:SierraTeam@moskovitzlaw.com)>; Sow-Legal <[Sow-Legal@blhny.com](mailto:Sow-Legal@blhny.com)>; Wood <[wood@klflaw.com](mailto:wood@klflaw.com)>

**Subject:** Re: In re: NYC Policing During Summer 2020 - Conforti Privilege Log

Thank you, Stephanie.

Here is a Zoom link we can use for the meet and confer:

Corey Stoughton (she/her) is inviting you to a scheduled Zoom meeting.

Join Zoom Meeting

<https://legalaid.zoom.us/j/91847604580?pwd=UnBQUVpSV3EyMjByK2RNVmE5ZmJ5dz09&from=addon>

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+1 346 248 7799 US (Houston)

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---

**From:** Breslow, Stephanie (Law) <[sbreslow@law.nyc.gov](mailto:sbreslow@law.nyc.gov)>

**Sent:** Monday, May 23, 2022 5:10 PM

**To:** Stoughton, Corey <[CStoughton@legal-aid.org](mailto:CStoughton@legal-aid.org)>; Weng, Jenny (Law) <[jweng@law.nyc.gov](mailto:jweng@law.nyc.gov)>; Hamill, Bridget (LAW) <[brhamill@law.nyc.gov](mailto:brhamill@law.nyc.gov)>; Nelson, Genevieve (Law) <[gnelson@law.nyc.gov](mailto:gnelson@law.nyc.gov)>; Braun, Daniel (Law) <[dbraun@law.nyc.gov](mailto:dbraun@law.nyc.gov)>; Riordan, Shannon (LAW) <[sriordan@law.nyc.gov](mailto:sriordan@law.nyc.gov)>; Robinson, Amy (LAW) <[arobinso@law.nyc.gov](mailto:arobinso@law.nyc.gov)>; Ibrahim, Nadine (LAW) <[nibrahim@law.nyc.gov](mailto:nibrahim@law.nyc.gov)>

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**Subject:** RE: In re: NYC Policing During Summer 2020 - Conforti Privilege Log

Corey,

Defense counsel is available to meet and confer regarding the Conforti privilege logs this **Thursday, 5/26 at 3:30-4:30 pm.**

Stephanie

---

**From:** Stoughton, Corey <[CStoughton@legal-aid.org](mailto:CStoughton@legal-aid.org)>

**Sent:** Monday, May 23, 2022 10:00 AM

**To:** Breslow, Stephanie (Law) <[sbreslow@law.nyc.gov](mailto:sbreslow@law.nyc.gov)>; Weng, Jenny (Law) <[jweng@law.nyc.gov](mailto:jweng@law.nyc.gov)>; Hamill, Bridget (LAW) <[brhamill@law.nyc.gov](mailto:brhamill@law.nyc.gov)>; Nelson, Genevieve (Law) <[gnelson@law.nyc.gov](mailto:gnelson@law.nyc.gov)>; Braun, Daniel (Law) <[dbraun@law.nyc.gov](mailto:dbraun@law.nyc.gov)>; Riordan, Shannon (LAW) <[sriordan@law.nyc.gov](mailto:sriordan@law.nyc.gov)>; Robinson, Amy (LAW) <[arobinso@law.nyc.gov](mailto:arobinso@law.nyc.gov)>; Ibrahim, Nadine (LAW) <[nibrahim@law.nyc.gov](mailto:nibrahim@law.nyc.gov)>

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**Subject:** [EXTERNAL] Re: In re: NYC Policing During Summer 2020 - Conforti Privilege Log